

ESTTA Tracking number: **ESTTA498558**

Filing date: **10/05/2012**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92052576
Party	Defendant The Lester M. Griffin & Lavaniel W. Griffin Partnership
Correspondence Address	BRIAN P KINDER THE KINDER LAW GROUP APC 19200 VON KARMAN AVE, FOURTH FLOOR IRVINE, CA 92612 UNITED STATES patentlaw@ursuladay.net, bkinder@tklglaw.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Brian P. Kinder
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Signature	/BPK/
Date	10/05/2012
Attachments	2012.10.05 - consented motion for 60 day suspensionv2.pdf ( 4 pages )(11010 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**  
**BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of Trademark Registration No. 3104426

For the Mark: CINQUE

Date Registered: June 13, 2006

CINQUE MODA GMBH,

Petitioner,

v.

LESTER M GRIFFIN,

Registrant.

Cancellation No. 92052576

**CONSENTED MOTION FOR SIXTY (60) DAY**  
**SUSPENSION OF DEADLINES**

Pursuant to a meet and confer telephone conference between counsel for Registrant and counsel for Petitioner, the parties, by and through counsel, hereby respectfully request that the Board suspend the above-captioned proceedings for a period of sixty (60) days. Counsel for Registrant and Petitioner had a telephonic meet and confer concerning Registrant's challenge that Petitioner failed to provide Pre-Trial Disclosures. Petitioner's counsel has a medical emergency that will require her to be away from the office for approximately six weeks. On those grounds, counsel for the parties have agreed to approach the Board with a request to suspend proceedings so that the parties may determine the status of the issues raised during the meet and confer. All parties reserve their rights in that regard.

On July 31, 2012, Registrant's counsel requested a sixty (60) day extension of deadlines. Petitioner's counsel submitted both an opposition and a sur-reply opposing the same. The Board has not yet ruled on that motion. Because of counsel for Petitioner's emergency, counsel for the parties have agreed to work from the supposition that the Board intends to grant the July 31, 2012 motion. On that basis, the parties submit that, if granted, this Consented Motion for Sixty (60) Day Suspension would result in the following deadlines:

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Discovery period to close:	: CLOSED
Time to Answer	: CLOSED
Deadline for Discovery Conference	: CLOSED
Discovery Opens	: CLOSED
Initial Disclosures Due	: CLOSED
Expert Disclosure Due	: CLOSED
Discovery Closes	: CLOSED
Plaintiff's Pretrial Disclosures	: CLOSED
Plaintiff's 30-day Trial Period Ends	: CLOSED
Defendant's Pretrial Disclosures	: CLOSED
Defendant's 30-day Trial Period Ends	: 01/13/2013
Plaintiff's Rebuttal Disclosures	: 01/28/2013
Plaintiff's 15-day Rebuttal Period Ends	: 02/27/2013

In light of the above, counsel for the Parties respectfully request that the Board suspend these proceedings as requested.

Dated: October 5, 2012

Respectfully submitted,

THE KINDER LAW GROUP, APC

s/Brian P. Kinder/  
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Attorneys for Registrant  
Lester Griffin

Dated: October 5, 2012

THE LAW OFFICES OF URSULA B. DAY

//s/

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Ursula B. Day, Esq.  
The Law Offices Of Ursula B. Day  
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New York, NY 10017  
Attorneys for Petitioner

**CERTIFICATE OF TRANSMISSION AND SERVICE**

I certify that on October 5, 2012, the foregoing CONSENTED MOTION FOR SIXTY (60) DAY SUSPENSION OF DEADLINES is being electronically filed via the Trademark Trial and Appeal Board's Electronic System for Trademark Trials and Appeals ("ESTTA").

Executed this 5<sup>th</sup> day of October, 2012, in Irvine, California.

THE KINDER LAW GROUP, APC

s/Brian P. Kinder/

Brian P. Kinder, Esq.

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Attorneys for Registrant

Lester Griffin